

To GeneralPermits NPDES/R1/USEPA/US@EPA

bco

Subject NPDES RPG NOI for Atlantic Paper Mills of NH, Winchester, NH

September 29, 2005

US EPA RGP-NOC Processing Municipal Assistance Unit (CMU) 1 Congress Street, Suite 1100 Boston, MA 02114-2023

RE: Remediation System Discharge at Atlantic Paper Mills of NH facility, Winchester, NH Notice of Intent to obtain coverage under the Remediation General Permit

To Whom It may Concern,

The attached Notice of Intent is submitted on behalf of Atlantic Paper Mills of NH, LLC to fulfill the requirements applicable to an existing discharge operating under a temporary permit exclusion letter, per the September 9, 2005 notice in the Federal Register. If there are any questions or additional information is required, please do not hesitate to contact me. Thank you.

Sincerely,

Michael D. Summerlin, Jr., P.E. Gemini Geotechnical Associates, Inc. 135 Lafayette Road, Suite 11 North Hampton, NH 03862 (603) 964-3788, ext. 308



fax (603) 964-3792 Atlantic Paper Mills RGP NOI submittal.pdf

B. Suggested Form for Notice of Intent (NOI) for the Remediation General Permit

1. General site information. Please provide the following information about the site:

| | 8 | | 1 | | | | | |
|---|--------------------------------|-----------------|-----------------------------|-----------------|------------------|--|--|--|
| a) Name of facility/site: Atlantic Paper Mill | s of NH | | Facility/site address: | | | | | |
| Location of facility/site: longitude: 42*47'25.2"N latitude: 072*27'29.6"W | Facility SIC cod 2621 Paper | ` ' | Street: 116 Lost Road | | | | | |
| b) Name of facility/site owner: Atlantic Pape | er Mills of NH | I, LLC | Town: Winchester | | | | | |
| Email address of owner: | | | State: NH | Zip: 03470 | County: Cheshire | | | |
| Telephone no.of facility/site owner: (631)232- | 2626 | | | | | | | |
| Fax no. of facility/site owner: (631)232-353 | 5 | | Owner is (check one): 1. Fe | | bal | | | |
| Address of owner (if different from site): | | | 3. Private 4. other, i | f so, describe: | | | | |
| Street: 325 Kennedy Drive, PO Box 12 | 296 | | | | | | | |
| Town: Hauppauge | | State: NY | Zip: 11788 | County: | | | | |
| c) Legal name of operator: | . • | Operator tele | lephone no: (603)336-8600 | | | | | |
| Atlantic Paper Mills of NH, | LLC | Operator fax | fax no.: (603)336-8602 | | | | | |
| Operator contact name and title: Brian Caisse | , Mill Managei | <u> </u> | | | | | | |
| Address of operator (if different from owner): | | Street: PO E |) Box 126 | | | | | |
| Town: Ashuelot | | State: NH | Zip: 03441 | County: Cheshir | е | | | |
| d) Check "yes" or "no" for the following: 1. Has a prior NPDES permit exclusion been grante 2. Has a prior NPDES application (Form 1 & 2C) et 3. Is the discharge a "new discharge" as defined by 4 4. For sites in Massachusetts, is the discharge cover | ver been filed for t | he discharge? Y | es No . if "ves," date | and tracking #: | No. | | | |

| generation of dis If "yes," please I 1. site identificat 2. permit or licen 3. state agency co | charge? Yes vist: ion # assigned by ase # assigned: GV ontact information | te permitting or other action which is No | 07-LUST | f) Is the site/facility covered by any other EPA permit, including: 1. multi-sector storm water general permit? Y N, number: NHR05A742 2. phase I or II construction storm water general permit? Y N, number: 3. individual NPDES permit? Y N, if Y, number: NH0001180 4. any other water quality related permit? Y N, number: | | | | | | |
|--|---|--|---|--|--|--|--|--|--|--|
| 2. Discharge in | n formation . Pleas | se provide information about the dis- | scharge, (attachir | ng additional sheets as needed) including: | | | | | | |
| to a pair of settling | tanks plumbed in para | llel, then flows by gravity to an oil/water se | eparator, then by gra | Groundwater and oil recovery from a 6" diameter well. Oil is pumped to a holding tank. Groundwater is pumped avity to a holding tank; water is pumped from holding tank through 25 micron and 5 micron bag filters at through a flow totalizer/velocity meter, and to a storm drain that discharges to the Ashuelot River. | | | | | | |
| b) Provide the following information about each discharge: | 1) Number of discharge points: | Average flow 70 gal. per day Is max | 2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft3/s)? Max. flow_10 gpm, 0.0223cfs Average flow_70 gal per day Is maximum flow a design value? Y V N For average flow, include the units and appropriate notation if this value is a design value or estimate if not available. | | | | | | | |
| | | | sw; pt.2: long lat; pt.3: long lat; pt.7: long lat; etc. | | | | | | | |
| 4) If hydrostatic testing, total volume of the discharge (gals): 5) Is the discharge intermittent or seasonal? Is discharge ongoing Yes No ? | | | | | | | | | | |
| c) Expected dates | s of discharge (mn | n/dd/yy): start_05/07/03 end_u | unknown | | | | | | | |
| d) Please attach a line drawing or flow schematic showing water flow through the facility including:1. sources of intake water, 2. contributing flow from the operation, 3. treatment units, and 4. discharge points and receiving waters(s). | | | | | | | | | | |

3. Contaminant information. In order to complete this section, the applicant will need to take a minimum of one sample of the untreated water and have it analyzed for all of the parameters listed in Appendix III. Historical data, (i.e., data taken no more than 2 years prior to the effective date of the permit) may be used if obtained pursuant to: i. Massachusetts' regulations 310 CMR 40.0000, the Massachusetts Contingency Plan ("Chapter 21E"); ii. New Hampshire's Title 50 RSA 485-A: Water Pollution and Waste Disposal or Title 50 RSA 485-C: Groundwater Protection Act; or iii. an EPA permit exclusion letter issued pursuant to 40 CFR 122.3, provided the data was analyzed with test methods that meet the requirements of this permit. Otherwise, a new sample shall be taken and analyzed.

a) Based on the analysis of the sample(s) of the untreated influent, the applicant must check the box of the sub-categories that the potential discharge falls within. VOC Only Gasoline Only Primarily Metals Urban Fill Sites Contaminated Sump Mixed Contaminants **Aquifer Testing** Fuel Oils (and VOC with Other Petroleum with Other Listed Contaminated Contaminated Hydrostatic Testing of Well Development or Other Oils) only Contaminants Contaminants Sites Dredge Condensates Pipelines/Tanks Rehabilitation

b) Based on the analysis of the untreated influent, the applicant must indicate whether each listed chemical is **believed present** or **believed absent** in the potential discharge. Attach additional sheets as needed.

| PARAMETER | Believe | Believe | # of | Type of | Analytical | Minimum | Maximum daily | value | Avg. daily value | · |
|------------------------------------|----------|---------|-----------------------------|------------------------|------------------------------|------------------------------|----------------------|-----------|-------------------------|-----------|
| | Absent | Present | Samples (1 min- imum) | Sample (e.g., grab) | Method Used (method #) | Level (ML) of Test Method | concentration (ug/l) | mass (kg) | concentration (ug/l) | mass (kg) |
| 1. Total Suspended Solids | ' | | | | | | | | - | |
| 2. Total Residual Chlorine | ' | | | | | | | | | |
| 3. Total Petroleum Hydrocarbons | | ~ | 14 | grab | 8015 B | 100 ug/l | 3,200 | 2.7x10-3 | 1,578 | 3.9x10-4 |
| 4. Cyanide | V | | | | | | | | | |
| 5. Benzene | V | | | | | | | | | |
| 6. Toluene | | | | | | | | | | |
| 7. Ethylbenzene | ~ | | | | | | - | | | |
| 8. (m,p,o) Xylenes | ~ | | | | | | | | | |
| 9. Total BTEX4 | V | | | | | | | | | |

⁴BTEX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.

| PARAMETER | Believe Absent | Believe Present | # of Samples | Type of Sample (e.g., | Analytical Method | Minimum Level (ML) of | Maximum daily value | | Avg. daily value | | |
|--|-------------------|--------------------|------------------|-----------------------|--|--------------------------|----------------------|-----------|-------------------------|-----------|--|
| | | | (1 min- imum) | grab) | Used (method #) | Test Method | concentration (ug/l) | mass (kg) | concentration (ug/l) | mass (kg) | |
| 10. Ethylene Dibromide ⁵ (1,2- Dibromo-methane) | > | | | | | | | | , | | |
| 11. Methyl-tert-Butyl Ether (MtBE) | | > | 13 | grab | 8260B | 2.0 | 9.0 | 3.6x10-6 | 3.44 | 8.4x10-7 | |
| 12. tert-Butyl Alcohol (TBA) | > | | | | | | | | | | |
| 13. tert-Amyl Methyl Ether (TAME) | ١ | | | | | | | | | | |
| 14. Naphthalene | | > | 19 | grab | 8260B | 5.0 | 32.8 | 5.1x10-5 | 1.73 | 7.4x10-7 | |
| 15. Carbon Tetra- chloride | V | | | | | | | | | | |
| 16. 1,4 Dichlorobenzene | 7 | | | | | | | | | | |
| 17. 1,2 Dichlorobenzene | / | | | | , and the second | | | | · | | |
| 18. 1,3 Dichlorobenzene | > | | | | | | | | | | |
| 19. 1,1 Dichloroethane | > | | | | | | | | | | |
| 20. 1,2 Dichloroethane | > | | , | | | - " | | | | | |
| 21. 1,1 Dichloroethylene | V | | | | | | | | | | |
| 22. cis-1,2 Dichloro- ethylene | > | | | | | | | | | | |
| 23. Dichloromethane (Methylene Chloride) | > | | | | | | | | | | |
| 24. Tetrachloroethylene | \ | | | | | , | | | | | |

 $^{^5\}mathrm{EDB}$ is a groundwater contaminant at fuel spill and pesticide application sites in New England.

| PARAMETER | R Believe Absent | | | | | lieve sent | # of Samples | Type of Sample (e.g., | Analytical Method Used | Minimum Level (ML) of Test | Maximum daily | value | Avg. daily Valu | e |
|---|---------------------|----------|--|----------|------------------|---------------|-----------------|-----------------------|---------------------------|----------------------------|-------------------------|-----------|-----------------|---|
| | | | | | (1 min- imum) | grab) | (method #) | Method | concentration (ug/l) | mass (kg) | concentration (ug/l) | mass (kg) | | |
| 25. 1,1,1 Trichloroethane | | 1 | | | | | | | | | | | | |
| 26. 1,1,2 Trichloroethane | | ' | | | | | | | | | | | | |
| 27. Trichloroethylene | | ' | | | | | | | | | | | | |
| 28. Vinyl Chloride | | 1 | | | | | | | | | | | | |
| 29. Acetone | | | | 1 | 12 | grab | 8260B | 10 | 14 | 3x10-6 | 2.25 | 5.5x10-7 | | |
| 30. 1,4 Dioxane | | 1 | | | | | | | | | | | | |
| 31. Total Phenols | | ~ | | | | | | | | | | | | |
| 32. Pentachlorophenol | | V | | | | | | | | | | | | |
| 33. Total Phthalates ⁶ (Phthalate esthers) | | ' | | | | | | | | | | | | |
| 34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl) Phthalate] | | ' | | | | | | | | | | | | |
| 35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH) | | | | | | | | | | | | | | |
| a. Benzo(a) Anthracene | | | | / | 19 | grab | 625/8270C | 10 ug/l | 0.18 | 2.8x10-7 | 0.01 | 4.1x10-9 | | |
| b. Benzo(a) Pyrene | | / | | | 19 | | | | | | | | | |
| c. Benzo(b)Fluoranthene | | / | | | 19 | | | | | | | | | |
| d. Benzo(k) Fluoranthene | | V | | | 19 | | | | | | | | | |
| e. Chrysene | | ' | | | 19 | | | | | | | | | |

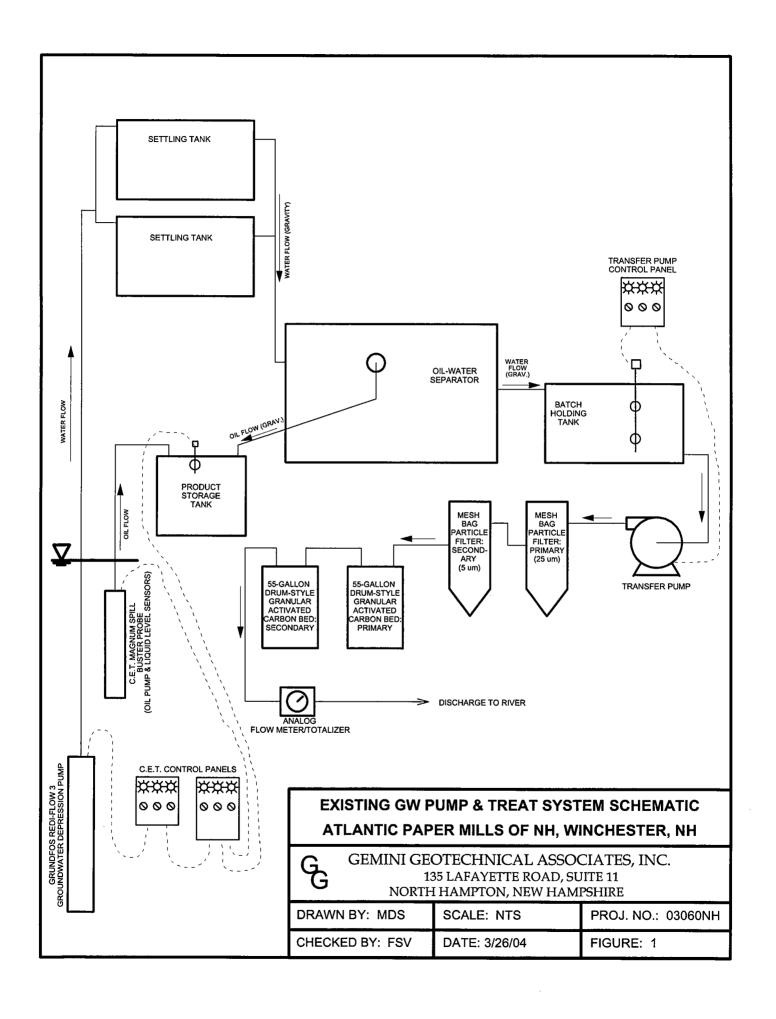
⁶The sum of individual phthalate compounds.

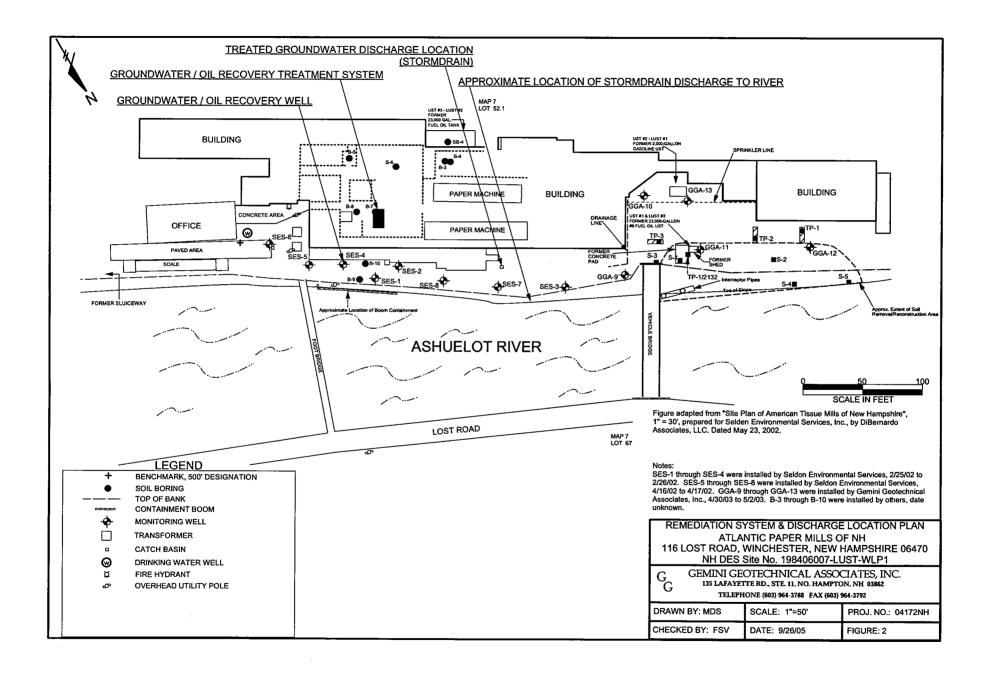
| PARAMETER | Believe Absent | Believe Present | # of Samples | Type of Sample (e.g., | Analytical Method Used | Minimum Level (ML) of | Maximum daily | value | Average daily value | | |
|---|-------------------|--------------------|------------------|-----------------------|---------------------------|--------------------------|----------------------|-----------|----------------------|-----------|--|
| | | | (1 min- imum) | grab) | (method #) | Test Method | concentration (ug/l) | mass (kg) | concentration (ug/l) | mass (kg) | |
| f. Dibenzo(a,h) anthracene | / | | 19 | | | | | | | | |
| g. Indeno(1,2,3-cd) Pyrene | > | | 19 | | | | | | | | |
| 36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH) | | | | | | | | | | | |
| h. Acenaphthene | | ' | 19 | grab | 625/8270C | 10 ug/l | 2.44 | 3.8x10-6 | 0.13 | 5.5x10-8 | |
| i. Acenaphthylene | ١ | | 19 | | | | | | | | |
| j. Anthracene | / | | 19 | | | | | | | | |
| k. Benzo(ghi) Perylene | < | | 19 | | | | | | | | |
| l. Fluoranthene | 7 | | 19 | | | | | | | | |
| m. Fluorene | | > | 19 | grab | 625/8270C | 10 ug/l | 6.49 | 1x10-5 | 0.34 | 1.5x10-7 | |
| n. Naphthalene- | | > | 19 | grab | 625/8270C | 10 ug/l | 27.7 | 4.3x10-5 | 1.46 | 6.3x10-7 | |
| o. Phenanthrene | | > | 19 | grab | 625/8270C | 10 ug/l | 5.13 | 8x10-6 | 0.27 | 1.2x10-7 | |
| p. Pyrene | \ | | 19 | | | | | 1 | | | |
| 37. Total Polychlorinated Biphenyls (PCBs) | > | | | | | | | | | | |
| 38. Antimony | > | | | | | | | | | | |
| 39. Arsenic | ~ | | | | | | | | | | |
| 40. Cadmium | > | | | | | | | | | | |
| 41. Chromium III | 7 | | | | | | | | | | |
| 42. Chromium VI | V | | | | | | | | | | |

| PARAMETER | Believe Absent | Believe Present | # of Samples | Type of Sample (e.g., | Analytical Method | Minimum Level (ML) of | Maximum daily | value | Avg. daily value | | | |
|---|-------------------------|-----------------------------|-------------------------------|-----------------------|----------------------|--------------------------|---|--|---------------------------------------|----------------------------|--|--|
| | | | (1 min- imum) | grab) | Used (method #) | Test Method | concentration (ug/l) | mass (kg) | concentration (ug/l) | mass (kg) | | |
| 43. Copper | V | | | | | | | | | | | |
| 44. Lead | V | | | | | | | | | | | |
| 45. Mercury | V | | | | | | | | | | | |
| 46. Nickel | 1 | | | | | | | | | | | |
| 47. Selenium | V | | | | | | | | | | | |
| 48. Silver | V | | | | | | | | | | | |
| 49. Zinc | V | | | | | | | | | | | |
| 50. Iron | V | | | | | | | | | | | |
| Other (describe): CARBON DISULFIDE | | | 13 | grab | 8260B | 10 ug/l | 200 | 8x10-5 | 22.11 | 5.4x10-6 | | |
| c) For discharges where me | tals are be | lieved pres | ent, please fi | ll out the follow | ving: | | | | | | | |
| Step 1: Do any of the meta effluent limits in Appendix | | | | | | If yes, which | If yes, which metals? | | | | | |
| Step 2: For any metals which calculate the dilution factor instructions or as determin What is the dilution factor Metals: DF: | or (DF) us ed by the | sing the for State prior | mula in Part to the submis | I.A.3.c) (step 2) | of the NOI | Appendix IV | limit calculated at V. Do any of the norresponding efflutentration above the lift "Yes," list w | netals in the i ent limits in e limit set at | influent have the Appendix IV (i.e | potential to e., is the | | |

| 4. Treatment system information. Please describe the treatment system using separate sheets as necessary, including: | | | | | | | | | | | |
|--|--|---|----------------------|---------------------------------------|------------------------|------------------|---|---------------|--------------|--------------|------------------|
| a) A description of the treatm | ent system, inc | luding a schematic | of the | isting treatmer | nt syste | m: See Section 2 | a) of t | this NOI forn | n for a | description. | |
| b) Identify each applicable | Frac. tank | Air stripper | | Oil/water sep | arator | 1 | Equalization tanks | V | Bag filter | V | GAC filter |
| treatment unit (check all that apply): | Chlorination | Dechlorination | on | Other (please | describe): | | | | | | |
| c) Proposed average and man Average flow rate of discharge | | ates (gallons per m Maximum flow i | | | | | rate(s) (gallons per ign flow rate of trea | | | | ystem: |
| d) A description of chemical | additives being | used or planned to | o be us | ed (attach MSD | S sheets): no | ne | | | | | |
| 5. Receiving surface water(s). Please provide information about the receiving water(s), using separate sheets as necessary: | | | | | | | | | | | |
| a) Identify the discharge path | way: | Direct | With | nin facility | Storm drain_ | ~ | River/brook_ | Wet | tlands | ☐ Ot | ther (describe): |
| b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters: Storm drain directly discharging to the Ashuelot River. | | | | | | | | | | | |
| c) Attach a detailed map(s) in 1. For multiple discharges, no 2. For indirect dischargers, in The map should also include mapping), such as surface was | umber the dischedicate the locate the location and | narges sequentially tion of the discharg d distance to the no | ge to th earest s | ne indirect conve sanitary sewer a | eyance and the | discha | | | (based on US | GS top | oographical |
| d) Provide the state water quality classification of the receiving water Class B | | | | | | | | | | | |
| e) Provide the reported or cal Please attach any calculation | culated seven d sheets used to | lay-ten year low flosupport stream flos | ow (7Q w and c | (10) of the recei | ving water_48 ions. | .6 | | _cfs | | | |
| f) Is the receiving water a listed 303(d) water quality impaired or limited water? Yes No. If yes, for which pollutant(s)? Mercury, as are all rivers list there a TMDL? Yes No. If yes, for which pollutant(s)? | | | | | | | | | | | |

| 6. Results of Consultation with Federal Services: Please provide the following information according to requirements of Part I.B.4 and Appendices II and VII. |
|--|
| a) Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge? Yes No Has any consultation with the federal services been completed? No or is consultation underway? No What were the results of the consultation with the U.S. Fish and Whalife Service and/or National Marine Fisheries Services (enterwoone): a "no jeopardy" opinion? or written concurrence on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat? |
| b) Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility or site or in proximity to the discharge? Yes No Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes No |
| 7. Supplemental information. : |
| Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit. |
| 8. Signature Requirements: The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. |
| Facility/Site Name: Atlantic paper Mills of New Hampshni LLC Operator signature: De Ca Title: Mill Manager Date: 9-28-05 |







GEMINI GEOTECHNICAL ASSOCIATES, INC.

September 23, 2005 GGA Proj. No. 04172NH Geotechnical and Environmental Engineers and Consultants

U.S. Fish and Wildlife Service 70 Commercial Street, Suite 300

Concord, NH 03301-5087

ATTN: Mr. Michael Amaral, Chief, Endangered Species Section

Via Fax: (603) 223-0104

RE: Notice of Intent to discharge treated groundwater to the Ashuelot River Atlantic Paper Mills of NH, 116 Lost Road, Winchester, NH

Dear Mr. Amaral:

On behalf of Atlantic Paper Mills of New Hampshire, LLC, I am preparing the Notice of Intent (NOI) for a Remediation General Permit under the US EPA NPDES program for their facility in Winchester, New Hampshire, along the Ashuelot River. The Permit pertains to the discharge of treated groundwater recovered as part of a fuel oil release remediation. As part of the NOI, the following question must be answered: "Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge?". The discharge is located at the facility on Lost Road, on the south bank of the Ashuelot River, at Longitude 42*47'25.2"N and latitude 072*27'29.6"W, and approximately 0.4 miles upstream of the Winchester / Hinsdale town line. I am seeking either "a 'no jeopardy' opinion or written concurrence on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat".

Please contact the undersigned if you have any questions or require additional information. Thank you for your assistance.

Sincerely,

GEMINI GEOTECHNICAL ASSOCIATES, INC.

Michael D. Summerlin, Jr., P.E.

Project Manager

Senior Environmental Engineer